



**DRAFT
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July 30, 2019

By Overnight Mail and Electronic Mail

Phillip Brooks
Director, Air Enforcement Division
U.S. Environmental Protection Agency
MC 2242A, Room 1117 WJCS
1200 Pennsylvania Ave. NW
Washington, DC 20004

Connie Ellis
Section Chief
Compliance and Enforcement
Kansas Department of Health and
Environment
1000 SW Jackson, Suite 310
Topeka, Kansas 66612-1366

Celena Cage
Enforcement Administrator
Office of Environmental Compliance
Louisiana Department of Environmental
Quality
602 N. Fifth Street
Baton Rouge, Louisiana 70802

Re: July 2019 Paragraph 54 Semi-Annual Report (Report #3), Consent Decree, *United States et al. v. Columbian Chemicals Company*, Civil Action No. 17-1661 (W.D. La.)

Dear Mr. Brooks, Ms. Ellis, and Ms. Cage:

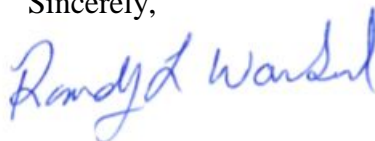
Pursuant to Paragraph 54 of the consent decree in the above-captioned matter, Birla Carbon U.S.A., Inc. is submitting the attached July 2019 semi-annual report for the first half of 2019 (“Report #3”).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there

are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Please contact me at 770-792-9435 or randy.waskul@adityabirla.com if you have any questions about Report #3.

Sincerely,



Randy Waskul
Global Director, Health, Safety & Environmental

CC: Kellie Ortega, U.S. EPA (by email)
Stacey Dwyer, U.S. EPA Region 6 (by overnight mail and email)
Lisa Gotto, U.S. EPA Region 7 (by overnight mail and email)
Chief, Air Permitting and Compliance Branch, U.S. EPA Region 7 (by overnight mail)
Alex Chen, U.S. EPA Region 7 (by overnight mail and email)
Thomas Mariani, U.S. DOJ (by overnight mail and email)
Eli Quinn, U.S. DOJ (by email only)
Kate Gleeson, KDHE (by email only)
Brandon Williams, LDEQ (by email only)
David Buente, Sidley Austin LLP (by email)
Peter Whitfield, Sidley Austin LLP (by email)